

ANTHONY J. NUNES (BAR NO. 290224)
NUNES LAW GROUP, APC
15260 Ventura Blvd, Suite 1200
Sherman Oaks, CA 91403
Phone: (855) 422-5529
tony@nunesworkerrightslaw.com

Attorneys for Plaintiffs ANTHONY GREGG, SHAWN GRANGER, and WALLID SAAD, on behalf of themselves and all others similarly situated

GRANT P. ALEXANDER (BAR NO. 228446)
E-Mail: galexander@allenmatkins.com
MELISSA K. BELL (BAR NO. 312873)
E-Mail: mbell@allenmatkins.com
ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
865 South Figueroa Street, Suite 2800
Los Angeles, California 90017-2543
Phone: (213) 622-5555
Fax: (213) 620-8816

Attorneys for Defendants MONASTERY CAMP, WILLIAM DAWSON, RICHARD DEWEY, and MICHAEL LAHORGUE

UNITED STATE DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ANTHONY GREGG, SHAWN GRANGER,
and WALLID SAAD, on behalf of
themselves and all others similarly situated,

Plaintiffs,

vs.

MONASTERY CAMP, WILLIAM
DAWSON, RICHARD DEWEY, MICHAEL
LAHORGUE, and DOES 1-10,

Defendants.

Case No. 3:23-CV-02760-AMO

Hon. Araceli Martinez-Olguin

**STIPULATION TO DISMISS
COMPLAINT WITH PREJUDICE AS TO
PLAINTIFFS, AND WITHOUT
PREJUDICE AS TO ANY OTHER
AGGREIVED WORKERS, PURSUANT
TO RULE 41(a)(1)(A)(ii); [PROPOSED
ORDER]**

Complaint Filed: June 26, 2025

1 Plaintiffs ANTHONY GREGG, SHAWN GRANGER, and WALLID SAAD,
2 (“Plaintiffs”) and Defendant MONASTERY CAMP, WILLIAM DAWSON, RICHARD
3 DEWEY, MICHAEL LAHORGUE, (“Defendants”) (collectively, the “Parties”), by and through
4 their respective counsel of record, stipulate and agree as follows:
5

6 WHEREAS, on June 5, 2023, Plaintiffs filed a complaint (“Complaint”) in this Court
7 alleging violations of the Fair Labor Standards Act; the California Labor Code and the California
8 Industrial Welfare Commission Wage Orders; the Business and Professions Code; and the
9 California Private Attorneys General Act (“PAGA”);

10 WHEREAS, on September 11, 2023, then-named Defendants Bohemian Club and
11 Pomella LLC filed motions to dismiss, which were granted with prejudice on January 19, 2024;

12 WHEREAS, on May 23, 2024, after requesting and obtaining leave to amend, Plaintiffs
13 filed a Second Amended Complaint, against Defendants, in which Plaintiffs added three
14 individuals (William Dawson, Richard Dewey, Michael LaHorgue) as Defendants;
15

16 WHEREAS, on November 20, 2024, the Parties mediated the dispute and reached a
17 negotiated settlement;
18

19 WHEREAS, on June 18, 2025, the Court denied the parties’ Joint Motion for Approval
20 of PAGA settlement;

21 WHEREAS, following the Court’s June 18, 2025 order, the Parties negotiated a new
22 settlement, and on July 10, 2025, the Parties executed a confidential agreement to settle Plaintiffs’
23 claims on an individual basis, and agreeing to dismiss Plaintiffs’ PAGA claims without prejudice;
24

25 WHEREAS, the Parties’ Settlement Agreement includes resolution of all Plaintiffs’
26 individual claims with prejudice under state and federal law, however the revised Settlement
27 Agreement does not include any PAGA settlement.
28

1 NOW THEREFORE, the Parties stipulate as follows:

2 1. Pursuant to Federal Code of Civil Procedure Rule 41(a)(1)(A)(ii), the Complaint,
3 and all claims for relief contained therein, shall be dismissed, with prejudice as to Plaintiffs, and
4 without prejudice as to any other aggrieved workers under PAGA.
5

6
7 Dated: July 11, 2025

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

8
9 By: /s/ Melissa K. Bell

10 MELISSA K. BELL, Esq.
11 Attorneys for Defendants

12 Dated: July 11, 2025

NUNES LAW GROUP, APC

13 By: Anthony J. Nunes
14 ANTHONY J. NUNES, Esq.

15 Attorneys for Plaintiffs
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